

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**FILED**

3/30/2023

**RECEIVED**

KRA

Grace L. Stovall

Plaintiff

vs

Lori Lightfoot in her individual and official capacity

City of Chicago, City of Chicago Police Department in their individual and official capacity

David Brown Superintendent of the Chicago Police Department

Kimberly Foxx in her individual and official capacity

Melinda Barrett States Attorney victim witness supervisor

Michael Blanchard

Mark Blanchard

Mario Cusumano

Deeatra Love Blanchard

Steven Robinson

Nanette Foster

Wayne Thomas

Kushala Vora

Gabe Williams

Amy McCarty

Tarick Loutfi

Mark Flessner

Chicago Police officer : Jermaine Townsend

Chicago Police officer : Gemera Brown

Chicago Police officer : Henry Lai

Chicago Police officer : Marco Torres

Chicago Police officer: Grzgorz Wilcvek

Chicago Police officer: Sylvia Szarek

Chicago Police officer: Gabriel Ruvalcaba

Chicago Police officer: Kelvin Williams

Chicago Police officer: Robert Costello

Chicago Police officer: Tamara Margolis

Chicago Police officer: Kellee Gary

Chicago Police officer: Orlando Long

Chicago Police officer: Joseph Aguirre

Chicago Police officer: Dario Mariscal

Chicago Police officer: Steven Rowling

Chicago Police officer: Eric Carter

Non Record and Unknown Defendants

All Defendants in their individual and official capacity

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTTHOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

3/20/2023

**1:23-cv-1761  
JUDGE PACOLD  
MAGISTRATE JUDGE COLE  
RANDOM**

Chicago Police officer : Jermaine Townsend	Badge # 19758	51st Wentworth Police Station
Chicago Police officer : Gemera Brown	Badge # 13372	51sr Wentworth Police Station
Chicago Police officer : Henry Lai	Badge # 21838	51st Wentworth Police Station
Chicago Police officer : Marco Torres	Badge # 21344	51st Wentworth Police Station
Chicago Police officer: Grzgorz Wilcvek	Badge # 17490	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Sylvia Szarek	Badge # 11526	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Gabriel Ruvalcaba	Badge # 1879	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Kelvin Williams	Badge # 847	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Robert Costello	Badge # 231	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Tamara Margolis	Badge # 594	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Kellee Gary	Badge # 20044	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Orlando Long	Badge# 1455	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Joseph Aguirre	Badge # 20510	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Dario Mariscal	Badge# 7023	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Steven Rowling	Badge # 993	51 <sup>st</sup> Wentworth Police Station
Chicago Police officer: Eric Carter	First Deputy Superintendent of the City of Chicago Police Department	

Complaint at Law

Now Comes the Plaintiff, Grace Stovall, complaining against the Defendants, Chicago Police officers: Jermaine Townsend, Gemera Brown, Grzgorz Wilcvek, Sylvia Szarek, Henry Lai, David Brown (Superintendent of the Chicago Police Department) Marco Torres, Gabriel Ruvalcaba, Kelvin Williams, Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal, Steven Rowling and other unidentified Chicago police officers, individually, and The City of Chicago et, al. who "acted in concert" with their accomplices Defendants Lori Lightfoot, David Brown (Superintendent of Chicago Police Department), Kimberly Foxx, Melinda Barrett, Michael Blanchard, Mario Cusumano, Deeatra Love Blanchard, Mark Blanchard, Kushala Vora, Steven Robinson, Nanette Foster, Wayne Thomas, Amy McCarty, Tarick Loutfi, Gabriel Williams, Alton Williams, Eric Carter (DSP of Chicago Police), Mark Flessner, individually and in their official capacity and the City of Chicago as follows: I Grace Stovall, the Aggrieved Plaintiff, state under oath, in accordance to the law that my Civil Rights have been willfully violated by these Defendant City of Chicago Police Officers and their accomplices who "acted in concert" to willfully violate the Plaintiff, Grace Stovall's Civil Rights that are protected under the Constitution and the laws of the United States Under 42 U.S.C § 1983, 1985 and 1986. The Court having jurisdiction under 28 U.S.C § 1343 and 1367.

**Facts Common to All Counts**

1. This action is brought pursuant to the Laws of the United States Constitution, specifically, 42 U.S.C. § 1983 and § 1988, and the laws of the State of Illinois to redress deprivations of the Civil Rights of the Plaintiff, and accomplished acts and /or omissions of the Defendants under color of law.
2. Jurisdiction is based on 28 U.S.C. § 1331, § 1343, and § 1367.
3. The Plaintiff, Grace Stovall, is a United States citizen and permanent resident of the State of Illinois.
4. The Defendant City of Chicago Police Officers, Jermaine Townsend, Gemera Brown, Henry Lai, Marco Torres, Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcaba, Kelvin Williams, Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal, Steven Rowling, David Brown (Superintendent of the Chicago Police Department and unidentified City of Chicago Police officers were at all relevant times duly appointed Police Officers of the City of Chicago and at all relevant times were acting within their scope of employment and under color of law when they "acted in concert" with their accomplices Lori Lightfoot, David Brown, Kimberly Foxx, Melinda Barrett, Michael Blanchard, Mario Cusmano, Deeatra Love Blanchard, Mark Blanchard, Steven Robinson, Kushala Vora, Nanette Foster, Wayne Thomas, Gabe Williams (City of Chicago employee that fences stolen property on his truck), his son Alton Williams (City of Chicago employee working for Sheriff's Department), Amy McCarty, Joseph Monahan, Tarick Loutfi , Lori Lightfoot, David Brown (Superintendent of the Chicago Police Department, Kimberly Foxx and other unknown Defendants that "acted in concert" with the Defendant City of Chicago Police.
5. The Defendant City of Chicago, was at all times relevant hereto an Illinois Municipal Corporation duly authorized and chartered under the laws of the State of Illinois, operating and managing the Chicago Police Department by and through its employees, including the Chicago Police officers Defendants Jermaine Townsend, Gemera Brown, Henry Lai, David Brown (Superintendent of the Chicago Police Department), Marco Torres, Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcaba, Kelvin Williams, Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal, Steven Rowling and other unidentified Chicago Police Officers.
6. On April 4, 2021, The Plaintiff was inside her residence in her bedroom when the offenders Michael Blanchard, and his accomplices came to the 3<sup>rd</sup> floor and trespassed into her apartment while she was naked and Michael Blanchard hit the Plaintiff in the head and face with a 2 x 4 beam as a weapon, he hit her with an iron chair from her dining room set and he sprayed her in her eyes and face with mace while she was calling 911 Emergency for help, an ambulance, fire department and police to arrest the offenders Michael Blanchard, Steven Robinson, Deeatra Love Blanchard, Mark Blanchard, Kushala Vora who "acted in concert" to commit the trespass, assault and battery.
7. On April 5, 2021, Plaintiff took her numerous Police reports that she "previously filed" against offenders Michael Blanchard and his accomplices and her April 4, police report against the offenders to the warrant office at 111<sup>th</sup> station where she signed warrants for the criminal trespass, assault and battery arrests of the Offenders, Michael Blanchard and his accomplices Mark Blanchard, Kushala Vora, Deeatra Love Blanchard, Steven Robinson and other unknown Defendants.

8. On April 7, 2021, Plaintiff was inside her residence sitting on her bed in her bedroom on the 3<sup>rd</sup> Flr. rear apartment located at 5114/5112 S. Ingleside, Chicago, Illinois.
9. On April 7, 2021, Defendants Jermaine Townsend and Gemera Brown and other unidentified Chicago Police Officers, were present at 5114/5112 S. Ingleside and they "acted in concert" with their accomplices, Michael Blanchard, Steven Robinson, Mario Cusumano, Deeatra Love Blanchard, Mark Blanchard and unknown Defendants.

**Count 1**

**Defendant Police "Acted In Concert" to Willfully Commit Unlawful/Unreasonable Search:**

**Defendant Chicago Police Jermaine Townsend, Gemera Brown, Henry Lai, Marco Torres, David Brown (Superintendent of Chicago Police Department), Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcava, Kelvin Williams, Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal, Steven Rowling, David Brown (Superintendent of City of the Chicago Police Department) and other unidentified Chicago Police Officers "acted in concert"**

10. Plaintiff incorporates by reference 1 through 9 above as if fully set forth herein.
11. Plaintiff resided at 5114/5112 S. Ingleside Chicago, Illinois with assigned keys exclusively made and allocated for the Plaintiff's exclusive use as a legal tenant, as confirmed on her State ID, mail, a lease and Security deposit rent receipt that was signed by Michael Blanchard on his "official" business stationary "Blanchard Enterprises" receipt, that he personally gave to the Plaintiff, Grace Stovall.
12. Plaintiff was not committing any crime or breaking any laws.
13. The Defendants "acted in concert" and illegally entered the Plaintiff's home while she was sitting on her bed in her bedroom naked from the waist down.
14. Evidence Police Body Camera video footages recorded the Plaintiff, Grace Stovall's nakedness.
15. The Defendants did not have a search warrant to enter the Plaintiff's home while she was naked from the waist down.
16. The Defendants did not have probable cause to enter the Plaintiff's home while she was naked from the waist down sitting on her bed in her bedroom.
17. Defendants "acted in concert" to forcefully break into the Plaintiff's home while she was naked from the waist down sitting on her bed in her bedroom.

18. The Defendant City of Chicago Police "acted in concert" and committed Police Brutality when the Police grabbed, tackled and maliciously "torture handcuffed" the Plaintiff causing her excruciating pain and bruises all over her body while the Plaintiff was naked from the waist down, on her bed in her bedroom while male Police were present with the female Plaintiff naked.
19. Defendants City of Chicago Police "acted in concert" to willfully commit Police brutality causing lacerations and bruises all over the Plaintiff's body and serious injuries and nerve damage to the Plaintiff's wrists, fingers and hands.
20. Defendants searched Plaintiff's person while she was naked from the waist down.
21. Said actions of the Defendants were intentional, willful and wanton.
22. As a direct and proximate consequence of said conduct of the Defendants, the Plaintiff suffered violations of her Constitutional rights, emotional anxiety, trauma, fear, pain, police brutality bruises all over her body, suffering monetary loss, expense, willful endangerment and invasion of her personal privacy while she was naked in the presence of Defendant Chicago police men.
23. Defendant City of Chicago Police "acted in concert" with their accomplices Michael Blanchard, Deeatra Love Blanchard, Mario Cusumano, Mark Blanchard, Steven Robinson Nanette Foster, Wayne Thomas, Amy McCarty, Tarick Loutfi and unknown Defendants to continue their illegal patterns of stalking, liable, slander, defamation, endangerment of the plaintiff's life by the Police "acting in concert" to willfully fabricate false police reports to false arrest, malicious prosecute the Plaintiff to illegally Police evict her to facilitate the Police Robbery Raid Home Invasion of the Plaintiff's apartment to steal her "apartment full" of her possessions, valuables and evidence that she collected against the Defendant City of Chicago Police and their accomplices
24. Defendant City of Chicago Police "acted in concert" with slumlords Michael Blanchard, Deeatra Love Blanchard and their accomplices to commit illegal eviction lock out during the Federal Eviction Moratorium, Stay at home orders, causing the Plaintiff to be on the streets, homeless and indigent.
25. Defendant City of Chicago Police 'acted in concert' to willfully fabricate false Police report to willfully commit malicious prosecution false arrest of the Plaintiff based on the police acting in concert with their accomplices to willfully fabricate false allegations on false police report
26. Defendant City of Chicago Police "acted in concert" with their accomplices and Michael Blanchard to fraudulently steal the "apartment full" of the Plaintiff's clothing, possessions and valuables that includes numerous legal briefs, litigation file, Defendant Chicago Police depositions, numerous affidavits and evidentiary evidence and research information on the Defendants and their accomplices

WHEREFORE, the Plaintiff, Grace Stovall prays for judgment against the Defendants jointly and severally, for reasonable compensatory damages and punitive damages, plus attorney's fees and costs, and any other relief this Honorable Court deems just and appropriate.

**Count II**

**Unreasonable Seizure:**

**Defendant: City of Chicago Police Officers Jermaine Townsend, Gemera Brown, Henry Lai  
Marco Torres, David Brown (Superintendent of the City of Chicago Police Department)  
Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcaba, Kelvin Williams,  
Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal,  
Steven Rowling and other unidentified Chicago Police Officers “acted in concert”**

Plaintiff's incorporates by reference ¶ 1 through 26 above as if fully set forth herein.

**27. Defendants told Plaintiff she was under arrest.**

**28. Defendants seized and searched the female Plaintiff while she was naked from the waist down.**

**29. Defendant male police saw the female Plaintiff naked.**

**30. Defendants forced Plaintiff's hands behind her back and removed her from her residence  
against her will.**

**31. Defendants physically kept Plaintiff's hands handcuffed behind her back by while police  
willfully “torture handcuffed” her with steel handcuffs cutting into her wrists cutting off her blood  
circulation, causing her excruciating pain, red swelling, numb hands fingers and nerve damage.**

**COUNT III**

**EXCESSIVE FORCE:**

**Defendant: City of Chicago Police Officers: Jermaine Townsend, Gemera Brown,  
David Brown (Superintendent of Chicago Police Department), Henry Lai, Marco Torres,  
Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcaba, Kelvin Williams, Robert Costello,  
Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal, Steven Rowling  
and other unidentified Chicago Police Officers “acted in concert”**

Plaintiff incorporates by reference ¶ 1 through 31 above as if fully set forth herein.

**32. On April 7, 2021, Defendants used excessive force on the Plaintiff, Grace Stovall, while acting  
within the course and scope of their employment as City of Chicago employees.**

**33. On April 7, 2021, Defendants “acted in concert” with their accomplices to willfully violate the  
Plaintiff, Grace Stovall's Civil/Constitutional rights.**

**34. The April 7, 2021, force was unreasonable, done without legal justification, without a warrant  
without probable cause and without due process.**

35. Plaintiff suffered injuries, bruises, lacerations and bodily harm due to the force used against her.
36. There was no legal justification or probable cause to use the amount of force utilized by the Defendants.
37. The Plaintiff's conduct before, during, and after the use of force did not warrant the amount of force utilized by Defendants against the Plaintiff.
38. At the time that force was used against the Plaintiff, Defendants knew, or should have known, that there was no probable cause or legal justification to use the amount of force that was used against the Plaintiff.
39. The force used by the Defendants was under color of law, was objectively unreasonable and with malice, and was undertaken intentionally and with a willful indifference to the Plaintiff's Constitutional Rights.
40. As a direct and proximate consequence of said conduct of the Defendants, and the Defendants "acting in concert" with their accomplices, the Plaintiff suffered violations of her Constitutional Rights, emotional anxiety, fear, pain, police brutality bruises all over her body, trauma, suffering, significant losses, missing critical deadline dates and other damages.

WHEREFORE, The Plaintiff, Grace Stovall, prays for judgment against the Defendant, jointly and severally, for reasonable compensatory damages and punitive damages, plus attorney's fees and costs and any other relief this Honorable Court deems just and appropriate.

#### COUNT IV

#### FAILURE TO INTERVENE:

Defendant: City Of Chicago Police Officers: Jermaine Townsend, Gemera Brown, Henry Lai  
Marco Torres, Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcaba, Kelvin Williams,  
Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal,  
Steven Rowling, David Brown (Superintendent of the City of Chicago Police Department)  
and other unidentified City of Chicago Police Officers who "acted in concert"

Plaintiff incorporates by reference ¶ 1 through 40 above as if fully set forth herein.

41. At the time that force was used against the Plaintiff, each individual Defendant Officer was in close proximity to both the Plaintiff and the other Defendant Officers, and could have intervened to stop or prevent the use of force, but failed to do so.
42. The misconduct by Defendants was objectively unreasonable and with malice and was undertaken intentionally or with a willful indifference to the Plaintiff's Constitutional rights.

43. Defendant's actions were undertaken in violation of Plaintiff's rights as guaranteed by the Constitution of the United States of America.

44. As a direct and proximate consequence of said conduct of the Defendants "acting in concert", the Plaintiff suffered violations of her Constitutional rights, emotional anxiety, fear, pain, trauma, suffering, significant losses and other damages.

**WHEREFORE:** The Plaintiff, Grace Stovall, prays for judgement against the Defendants, jointly and severally, for reasonable compensatory damages and punitive damages plus attorney's fees and costs, and any other relief this Honorable Court deems just and appropriate.

#### **COUNT V- INDEMINIFICATION- CITY OF CHICAGO**

Plaintiff incorporates by reference ¶ 1 through 44 above as if fully set forth herein.

45. Illinois law provides that public entities are directed to pay any tort judgement for compensatory damages for which employees are liable within the scope of their employment activities.

46. Defendant Chicago Police Officers Jermaine Townsend, Gemera Brown, Henry Lai, Marco Torres, Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcaba, Kelvin Williams, Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal, Steven Rowling and other Unidentified Chicago Police Officers were at all relevant times employees of the City of Chicago who acted within the scope of their employment in committing the police misconduct and police brutality described herein.

**WHEREFORE**, should any of the Defendant Chicago Police Officers Jermaine Townsend, Gemera Brown, Henry Lai, David Brown (Superintendent of Chicago Police Department Marco Torres, Grzgorz Wilcvek, Sylvia Szarek, Gabriel Ruvalcava, Kelvin Williams, Robert Costello, Tamara Margolis, Kellee Gary, Orlando Long, Joseph Aguirre, Dario Mariscal, Steven Rowling and unidentified Chicago Police Officer be found liable for the acts committed above, the City of Chicago would be liable to pay the Plaintiff, Grace Stovall, any judgment obtained against said Defendants and their accomplices who "acted in concert".

#### **COUNT VI- MONELL LIABILITY**

47. Plaintiff incorporates by reference ¶ 1 through 46 as if fully set forth herein.

48. At all relevant times, Defendant City of Chicago, acting through the Chicago Police Department developed, implemented, enforced, encouraged, and sanctioned de facto policies, practices, and /or customs exhibiting deliberate indifference to the Plaintiff's Constitutional rights which caused the violation of such rights, including, but not limited to, the search and seizure of individuals at their residences without justification and the use of excessive force and police brutality.

49. The de facto policies, practices, and/or customs occurred not only in Plaintiff's case but have also occurred in other cases where Chicago Police Officers illegally searched an individual's residence, illegally searched and individual's person, illegally seized and individual and used excessive force, including, but not limited to the following:

- a. Plevritis v. City of Chicago., No. 06 C 3401, 2007 U.S. Dist. LEXIS 68518 (N.D. Ill. Sep. 17, 2007), where Chicago Police Officers entered and searched a private residence without probable cause or a warrant ; Defendant Chicago Police Officers motion for Summary Judgment was denied.
- b. Jacobs v. City of Chicago., 215 F.3d 758, 773-74 (7<sup>th</sup> Cir. 2000), where Chicago Police Officers entered a residence without justification and the Defendant Police Officers use of force against [arrestee] while executing and illegal search of his home and unlawful seizure of his person was out of proportion to any danger that [arrestee] could possibly have posed to the officers or any other member of the community. "The Court found that the arrestee's Fourth Amendment rights may had been violated.
- c. See also "Investigation of the Chicago Police Department, "United States Dept. of Justice Civil Rights Div. and U.S. Attorney's Office Northern Dist. Of Ill., January 13, 2017, p.15 (We have serious concerns about the prevalence of racially discriminatory conduct by some Chicago Police Department Officers and the degree to which that conduct is tolerated and in some respects caused by deficiencies in Chicago Police Department's systems of training, supervision and accountability.  
In light of these concerns, combined with the fact that the impact of Chicago Police Department pattern or practice of unreasonable force fall heaviest on predominantly black and Latino neighborhoods, restoring police community trust will require remedies addressing both discriminatory conduct ant the disproportionality of illegal and unconstitutional patterns of force on minority communities")
- d. Other cases involving illegal searches, seizures, and excessive force.

50. The aforementioned Constitutional abuses and violations routinely committed by Defendant City of Chicago, through the actions of the Defendant officers, were and are directly and proximately caused by policies practices, and or customs developed, implemented, enforce, encouraged and sanctioned by Defendant City of Chicago, including the failure: (1) to adequately train and supervise its police officers and agents, including the Defendants, thereby failing to adequately discourage further Constitutional violations and unlawful conduct of the part of its police officers; (2) to properly and adequately monitor and discipline its Police Officers, including the Defendant Police Officers; and (3) to discipline Police misconduct, choosing instead to tolerate, and thereby promote, the de facto policies, practices, and/or customs of illegally searching residences, illegally searching and seizing residents, and using excessive force police brutality.

- 51. The aforementioned Constitutional abuses and violations willfully committed by the Defendant City of Chicago, through the actions of the Defendant officers, were and are directly and proximately caused by policies, practices, and/or customs developed implemented, enforced, encouraged and sanctioned by Defendant City of Chicago, including the failure: (1) to adequately train and supervise its Police officers and agents, including the Defendants, thereby failing to adequately discourage further Constitutional violations and unlawful conduct on the part of its Police officers; (2) to properly and adequately monitor and discipline its officers, including the Defendant Police Officers; and (3) to discipline Police misconduct, choosing instead to tolerate, and thereby promote, the de facto policies, practices, and or customs of illegally searching residences, illegally searching and seizing residents, and using excessive force police brutality.**
- 52. The aforementioned conduct and other conduct in other cases willfully committed by the City of Chicago Police Officers constitutes de facto policies, practices, and/or customs because the City of Chicago promoted, rather than discouraged, the following conduct:**
  - a. The failure to have a system which monitors patterns of unconstitutional Police misconduct;**
  - b. The failure to properly discipline sustained allegations of unconstitutional Police misconduct;**
  - c. The failure to properly maintain records of judicial findings of Police misconduct, including, but not limited to, illegal search, illegal seizure, and excessive force;**
  - d. The failure to properly train, hire, monitor, and/or supervise Police officers.**
  - e. A de facto policy, practice, and custom of the policy code of silence results in Police officers refusing to report instances of Police misconduct of which they are aware, including the use of excessive force and the maltreatment of persons, despite their obligations under Chicago Police Department regulations to do so. This conduct includes Police officers who remain silent or willfully give false or misleading information during official investigations in order to protect themselves or fellow officers from internal discipline or retaliation, civil liability, or criminal prosecution;**
  - f. The failure to discipline Chicago Police Officers who use excessive force or illegally search and/or seize persons or property.**
- 53. The aforementioned policies, practices, and customs, individually and collectively, have been maintained and/or implemented with deliberate indifference by Defendant City of Chicago, and its subsidiary department, and have encouraged the individual Defendant Police officers to commit the aforementioned wrongful acts against the Plaintiff and therefore acted as a direct and proximate cause of the complained of Constitutional violations and Plaintiff's injuries.**
- 54. Defendant's unlawful actions were done willingly, knowingly, and with the specific intent to injure the Plaintiff.**

WHEREFORE, the Plaintiff, Grace Stovall, prays for judgment against the Defendant City of Chicago for reasonable compensatory damages and punitive damages, plus attorney's fees and costs, and any other relief this Honorable Court deems just and appropriate.

**Plaintiff requests a trial by Jury**

**COUNT VII**

**DEFENDANT CITY OF CHICAGO POLICE "ACTED IN CONCERT" WITH THEIR ACCOMPLICES  
TO COMMIT CRIMINAL RICO RACKETEERING POLICE ROBBERY HOME INVASIONS**

Plaintiff incorporates by reference ¶ 1 through 54 as if fully set forth herein.

55. The Defendant City of Chicago Police "acted in concert" to commit criminal Rico Racketeering Police Robbery Raid Home invasions involving their accomplices, Defendant Mayor Lori Lightfoot and her administration, David Brown, Kimberly Foxx, Melinda Barrett, Amy McCarty, Joseph Monahan, Tarick Loutfi, Mario Cusumano, Mark Flessner, Michael Blanchard, Deeatra Love Blanchard, Mark Blanchard, Steven Robinson and other unidentified Defendant Criminal RICO Racketeers to commit criminal RICO Racketeering Police Robbery Raid Home Invasions.

56. Evidence confirms the Chicago Police Department is a criminal enterprise "acting in concert" to commit criminal RICO Racketeering involving Police Robbery Raid Home Invasions.

57. Defendant City of Chicago Police acting in concert with their accomplices Amy McCarty, Joseph Monahan, Monahan Law Group is a criminal enterprise "acting in concert" to commit criminal RICO Racketeering involving Police Robbery Raid Home Invasions.

58. Defendant City of Chicago Police "acting in concert" with their accomplice Tarick Loutfi & Associates is a criminal enterprise "acting in concert" to commit criminal RICO Racketeering involving RICO Racketeering Police Robbery Home Invasions.

59. Defendant Chicago Police "acting in concert" with Mario Cusumano is a criminal enterprise "acting in concert" with Michael Blanchard, Mark Blanchard Deeatrra Love Blanchard, Steven Robinson, Amy McCarty, Tarick Loutfi, Kushala Vora to commit criminal RICO Racketeering involving RICO Racketeering Police Robbery Home Invasions.

60. Evidence confirms that Defendant Mario Cusumano instructed Defendants: Michael Blanchard, Mark Blanchard Deeatra Blanchard, Steven Robinson, Nanette Foster, Wayne Thomas, Amy McCarty, Joseph Monahan, Tarick Loutfi, Gabriel Williams, Alton Williams and numerous other unidentified Defendants "to take the law into their own hands" because they could get away with committing these crimes without having to go to court" due to the City of Chicago Police were "acting in concert" with them.

61. Defendant Mario Cusumano would often discuss the Plaintiff's private business with his accomplices Michael Blanchard and Deeatra Love Blanchard, Mark Blanchard, Kushala Vora, Nanette Foster, Steven Robinson, Gabriel Williams, Alton Williams, Wayne Thomas and others unknown Defendants who "acted in concert" to invade the Plaintiff's privacy including his illegally taking pictures of the contents in the Plaintiff's apartment and removing documents and items from her apartment and illegally disseminating the private information to third parties.

#### COUNT VIII

##### DEFENDANT CITY OF CHICAGO POLICE "ACTED IN CONCERT" TO STALK AND TERRORIZE

Plaintiff incorporated by reference ¶ 1 through 60 as if fully set forth herein.

62. Defendant City of Chicago Police "acted in concert" to commit malicious stalking, terrorizing and hunting the Plaintiff with their accomplices Mario Cusumano, Michael Blanchard, Mark Blanchard, Deeatra Love Blanchard, Steven Robinson, Nanette Foster, Wayne Thomas, Amy McCarty, Joseph Monahan, Tarick Loutfi, Gabriel Williams, Alton Williams, Lori Lightfoot, Kimberly Foxx, David Brown (Superintendent of Police) and unknown Defendants who "acted in concert" to stalk out, terrorize and hunt the Plaintiff while they illegally meddled and terrorized her with unwanted obsessive stalking offenses to terrorize, taunt and illegally interfere in the Plaintiff's private affairs, without rights and without propriety while they willfully fabricated false allegations about the Plaintiff's lease, which is not under Chicago Police jurisdiction.

63. Evidence confirms the Defendant City of Chicago Police, their accomplices including numerous corrupt City of Chicago employees "acted in concert" to use this "infamous Police robbery scheme" to willfully commit Criminal RICO Racketeering Police Robbery Raid Home Invasions.

64. Defendant Gabriel Williams is a corrupt former City of Chicago employee that "fences stolen property on his truck" and he stores the stolen property in a coach house that he lives in that he claims that he inherited from another one of his victims of his deceptive practices that he commits with his accomplices Michael Blanchard, Mark Blanchard and Deeatra Love Blanchard who notarizes counterfeit documents.

#### COUNT IX

##### DEFENDANT CITY OF CHICAGO POLICE "ACTED IN CONCERT" TO WILFULLY COMMIT ENDANGERMENT AND WILLFUL FAILURE TO SERVICE AND PROTECT A VICTIM

Plaintiff incorporated by reference ¶ 1 through 64 as if fully set forth herein.

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65. The Defendant City of Chicago Police "acted in concert" to willfully commit endangerment, abandonment and willful failure to service and willful failure to protect the Plaintiff who was an obvious victim languishing in dangerous, hazardous conditions.

- a. The Defendant City of Chicago Police "acted in concert" to willfully ignore the numerous 30 plus, 8x10 signs the Plaintiff posted on her apartment walls to "cry out for help".
- b. The numerous 30 plus, 8x10 signs the Plaintiff posted on her apartment walls (for help) had her name, her apartment number, her address at 5114/5112 S. Ingleside on the signs along with her contact information.

COUNT X

**DEFENDANT CITY OF CHICAGO POLICE “ACTED IN CONCERT” TO COMMIT TAMPERING WITH PHYSICAL EVIDENCE AND WILLFULLY FABRICATING PHYSICAL EVIDENCE**

Plaintiff incorporated by reference ¶ 1 through 65 as if fully set forth herein.

66. Defendant City of Chicago Police “acted in concert” with Michael Blanchard, Deetra Love Blanchard, Mario Cusumano, Mark Blanchard, Steven Robinson, Nanette Foster, Wayne Thomas, Amy McCarty, Joseph Monahan, Tarick Loutfi, David Brown, Kimberly Foxx, Lori Lightfoot, and other unknown Defendants who “acted in concert” to alter, destroy, conceal and remove records, documents and things with purpose to impair its verity and impair its availability in such proceedings and investigations; and

67. Made, presented, fabricated, falsified records, documents, instruments and things knowing it to be false and with the purpose to deceive and mislead authorities who are engaged in such proceedings and investigations.

68. The illegal tampering with the physical evidence and willfully fabricating physical evidence, exclusively benefitted the Defendant Chicago Police and their accomplices and gave them illegal tactical advantages.

69. Defendant City of Chicago Police “acted in concert” with their aforementioned accomplices to willfully “pervert the course of justice” to commit “fraud upon the court” by illegally “misdirecting the direction of justice” to influence the outcome of their willfully fabricated, false cases to commit liable, slander and defamation of character against the aggrieved Plaintiff who was a victim of assault and battery and abuse.

70. Defendant City of Chicago Police “acted in concert” to commit Malfeasance to fraudulently and illegally use the 911 Emergency Call Center to willfully fabricate false Emergency calls with fabricate false reports to willfully commit malicious prosecution false arrests of the Plaintiff as Police willfully commit Criminal RICO Racketeering Police Robbery Raid Home Invasions involving the City of Chicago Police “acting in concert” with Lori Lightfoot, David Brown (Superintendent of the Chicago Police Department), Kimberly Foxx, Mario Cusumano, Amy McCarty, Joseph Monahan, Tarick Loutfi, Mark Flessner and other unidentified Defendants who “acted in concert” to willfully and illegally conceal numerous Police body camera evidence footages of their criminal RICO Racketeering Police Robbery Raid Home Invasions that traumatically injured the Plaintiff causing her traumatic, life changing, devastating losses and injuries.

71. Evidence confirms the Defendant City of Chicago Police “acted in concert” to willfully sabotage “Criminal” police reports by fraudulently tagging the Criminal police reports as Non-Criminal to fraudulently and illegally avoid an investigation.

72. a. Intent: Defendant City of Chicago Police “acted in concert” to willfully and purposefully interfere with the Plaintiff’s evidence and the Defendants had knowledge of the Court proceedings and investigations.

b. Knowledge: The Defendant City of Chicago Police “acted in concert” knowing and aware that their illegal actions would result in damage to the evidence and illegal interference in current and future proceedings.

c. Evidence includes every kind of physical object or documents, legal briefs, depositions, affidavits evidentiary evidence that was produced in legal trials, proceedings, and investigations, Federal Court mail, including computer digital images, and video recordings, emails sent to the Plaintiff from the Federal Court.

d. Awareness: Defendant City of Chicago Police “acted in concert” to commit an obvious crime knowing there were current and future proceedings.

**COUNT XI**

**DEFENDANTS "ACTED IN CONCERT" TO COMMIT CYBER THEFTS OF FEDERAL COURT EMAILS  
SENT TO THE PLAINTIFF ON THE FEDERAL COURT ECF SYSTEM**

Plaintiff incorporated by reference ¶ 1 through 72 as if fully set forth herein.

73. Defendants City of Chicago Police "acted in concert" with Defendants Michael Blanchard, Kushala Vora, Nanette Thomas, Mark Blanchard, Deeatra Love Blanchard, Steven Robinson, Mario Cusumano, Amy McCarty, Tarick Loutfi, Joseph Monahan and other unknown Defendants who used their personal computers to steal, print and disseminate the Plaintiff's private information to third parties including the Plaintiff's Federal Court emails and information involving her case sent to the Plaintiff on the United States District Federal Court ECF system.

74. The Defendants thefts of the Plaintiff's Federal Court emails caused to her to miss critical deadline dates resulting in significant damages and significant losses as a result of her missing critical deadline dates that were set by the Court.

**COUNT XII**

**DEFENDANT CITY OF CHICAGO POLICE "ACTED IN CONCERT" TO STALK, TERRORIZE  
AND TAKE ILLEGAL PHOTOGRAPHY OF THE PLAINTIFF IN HER APARTMENT,  
IN HER BATHROOM IN HER BEDROOM AND ILLEGAL PHOTOGRAPHY OF THE CONTENTS  
IN HER APARTMENT INVOLVING PHOTOGRAPHER LEROY DOYLE**

Plaintiff incorporated by reference ¶ 1 through 74 as if fully set forth herein.

75. The Defendant City of Chicago Police "acted in concert" to stalk out, terrorize and hunt down the Plaintiff with their accomplices who illegally took numerous pictures and illegal surveillance of the Plaintiff in her private apartment, in her private bedroom, in her private bathroom, when she would come and go in and out of her apartment reporting the information to third parties while the Defendants "acted in concert" to maliciously stalk, terrorize and hunt down the Plaintiff at the behest of Defendant City of Chicago Police and their accomplices who "acted in concert" with photographer Leroy Doyle who committed the stalking, terrorizing and illegal photography to defame and cast the Plaintiff in a false light without her consent.

76. When Plaintiff told the trespasser and intruder Leroy Doyle to stop taking pictures of her, he continued to take more pictures of her and Leroy Doyle ran downstairs into Defendants Michael Blanchard and his accomplices Deeatra Blanchard's apartment on the 1<sup>st</sup> floor of the building at 5112-5114 S. Ingleside.

**COUNT XIII**

**DEFENDANTS CITY OF CHICAGO POLICE "ACTED IN CONCERT" TO WILLFULLY COMMIT  
CRIMINAL CONTEMPT OF COURT**

Plaintiff incorporated by reference ¶ 1 through 76 as if fully set forth herein.

77. Defendant City of Chicago Police "acted in concert" with Defendants Michael Blanchard, Mark Blanchard, Deeatra Blanchard, Steven Robinson, Mario Cusumano, Nannette Foster, Kushala Vora, Wayne Thomas to willfully commit Criminal Contempt of Court by willfully violating the Court order dated July 6, 2021 which caused more damages and encouraged the numerous subsequent crimes committed by these Defendants who continue to willfully violate the Court order to date and counting.

**COUNT XIV**

**DEFENDANT CHICAGO POLICE "ACTED IN CONCERT" TO RETALIATE AGAINST THE PLAINTIFF  
WHO IS A WHISTLEBLOWER, WITNESS AND VICTIM**

Plaintiff incorporated by reference ¶ 1 through 77 as if fully set forth herein.

78. The Defendants City of Chicago Police "acted in concert" to willfully endanger the life of the Plaintiff by Defendant City of Chicago Police willfully and maliciously creating fraudulent, dangerous interactions that traumatized and endangered the Plaintiff's life.

Plaintiff incorporated by reference ¶ 1 through 78 as if fully set forth herein.

WHEREFORE, the Plaintiff, Grace Stovall, prays for judgment against the Defendant City of Chicago and their accomplices for reasonable compensatory damages and punitive damages, and return of her "apartment full" of her possessions and evidentiary evidence, plus attorney's fees and costs and any other relief this Honorable Court deems just and appropriate.

**Jury Demand**

Plaintiff requests a trial by jury

Respectfully submitted,  
By Grace L. Stovall, Plaintiff, Pro se

Date: March 20, 2023

Plaintiff filed 10 pages of Exhibits with this complaint including exhibits 8, 9 and 10 that shows illicit messages from Defendant Lori Lightfoot who "acted in concert" to illegally close 311 building complaints reported for dangerous and explosive conditions of smoking electrical wires in the walls due to Blanchard's illegal "meter jumping" to steal electricity for their building at 5114/5112 S. Ingleside, Chicago, Illinois

Michael Blanchard was sued by Peoples Gas for stealing gas resulting in Blanchard being banned from gas service in Circuit Court cases Peoples Gas vs Michael Blanchard Circuit Court Cases 99MI161540 and 95MI001747 and the City of Chicago sued (Slumlord) Michael Blanchard in Circuit Court Case 1987400301.

Also Evidence body camera video footages.

35-2

(Court Branch #  
or District #)

(Court Date/Time)

AREA 2 SUMMONS  
(Arresting Agency #)Exhibit 1

(Rev. 3/19/99) CCCR-0655

**MISDEMEANOR COMPLAINT** (This form replaces CCG-0655, CCMC-0222 & CCMC-0225)**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS****The People of State of Illinois,**

Plaintiff

v.

**MICHAEL BLANCHARD**

Defendant.

NO. \_\_\_\_\_

**GRACE STOVAL**

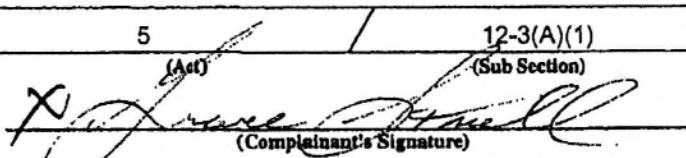
(Complainant's Name Printed or Typed)

complainant, now appears before

**The Circuit Court of Cook County and states the following:**That: MICHAEL BLANCHARD of 5112 S INGLESIDE 1ST FL CHICAGO, ILLINOIS has, on or about  
(defendant) (address)4 APRIL 21 at the location of 5112 S INGLESIDE 3RD FL CHICAGO, IL COOK COUNTY  
(date) (place of offense)committed the offense(s) of BATTERYin that he/she WITHOUT LEGAL JUSTIFICATION, KNOWINGLY AND INTENTIONALLY STRUCK GRACE STOVAL WITH A 2X4 BOARD AND STUCK THE VICTIM ABOUT THE HANDS, LEFT BRIEFLY CAME BACKED ARMED WITH A BOTTLE OF MACE, AND SPRAYED THE VICTIM IN THE FACE WITH IT AND THEN THREW A CHAIR AT THE VICTIM STRIKING HERABOUT THE BODY.in violation of 720 Illinois Compiled Statutes 5 / 12-3(A)(1)  
(Chapter) (Sub Section)

AOIC Code

--	--	--	--	--	--

  
 (Complainant's Signature)  
5112 S INGLESIDE  
 (Complainant's Address)
STATE OF ILLINOIS } ss:  
COOK COUNTY }
 (Complainant's Telephone)  
GRACE STOVAL  
 (Complainant's Name Printed or Typed)

The complainant, being first duly sworn on oath, deposes and says that he/she read the foregoing complaint by him/her subscribed and that the same is true.

  
 (Complainant's Signature)
Subscribed and sworn to before me on this 5 day of APRIL, 2021
  
 (Judge or Clerk)

I have examined the above complaint and the person presenting the same and have heard evidence thereon, and am satisfied that there is probable cause for filing same. Leave is given to file said complaint.

SUMMONS ISSUED, Judge \_\_\_\_\_ Judge's No. \_\_\_\_\_  
or \_\_\_\_\_

WARRANT ISSUED, Bail set at: \_\_\_\_\_

BAIL SET AT: \_\_\_\_\_ Judge \_\_\_\_\_ Judge's No. \_\_\_\_\_

**DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**

Exhibit 2

RB 0

JE 189305

COMPLAINANT (LAST, NAME)

STOVALL

COMPLAINANT (ADDRESS, CITY, STATE, ZIPCODE)

5112 S. INGLESIDE

DEFENDANT (LAST, NAME)

BLANCHARD

DEFENDANT (ADDRESS, CITY, STATE, ZIPCODE)

5112 S. INGLESIDE

ADDRESS OF OCCURRENCE

3RD

5112 S. INGLESIDE  
(FIRST, NAME)

GRACE

#3RD FL

(FIRST, NAME)

MICHAEL

1ST FL

SEX RACE AGE HEIGHT WEIGHT EYES HAIR COMPLEXION

DATE OF OCCURRENCE

DATE OF REQUEST

IR#

OFFENSE BATTERY

JLCS

COURT DATE

Crimes Against Property

NOTE TO STATE'S ATTORNEY

APPROVED BY STATE'S ATTORNEY REJECTED BY STATE'S ATTORNEY APPROVED BY JUDGE REJECTED BY JUDGE

**Exhibit 3**

Identify and describe all property or possible evidence recovered at the end of the Narrative in column form. Show exactly where found, when found, who found it and its description (include additional Property Inventory numbers). If property taken was scribed for Operation Identification, indicate I.D. number at end of Narrative. Offender's approximate description, if possible, should include name if known, sex, race code, age, height, weight, color eyes & hair, complexion, scars, marks, etc. If suspect is arrested, give name, sex, race code, age, C.B. or I.R. number, if known, and state "in custody."

**SUPPLEMENTARY REPORT**  
CHICAGO POLICE

1. INCIDENT/OFFENSE CLASSIFICATION LAST PREVIOUS REPORT										All descriptions and statements in this entire report are approximations or summarizations unless indicated otherwise.				4. DATE OF ORIG. OCCURRENCE - TIME • DAY MO. YR. 14 Apr 2021, 1534							
5. VICTIM/SUBJECT'S NAME AS SHOWN ON LAST PREVIOUS REPORT • Shavall Grace										1. UCR OFF. CODE 2. ADDRESS OF ORIG. INCIDENT/OFFENSE 0460 15112 S Ingleside #3				5. VERIFIED 6. CORRECTED • 1. YES 2. NO 1. YES 2. NO		6. BEAT OF OCCUR. 0233					
6. VICTIM/SUBJECT'S ADDRESS S112 S. Ingleside										7. FIRE RELATED • 1. YES 2. NO 1. YES 2. NO				7. BEAT ASSIGNED 0502							
8. TYPE OF LOCATION OR PREMISE WHERE INCIDENT/OFFENSE OCCURRED • Apartment										8. LOCATION CODE 090											
9. DESCRIBE PROPERTY IN NARRATIVE T-TAKEN R-RECOVERED										9. FILL IN THE FULL AMOUNT OF ONLY THOSE VALUES WHICH EITHER DIFFER FROM OR WERE NOT REPORTED ON THE ORIGINAL CASE REPORT OR THE LAST PREVIOUS SUPPLEMENTARY REPORT.											
1. MONEY		2. JEWELRY		3. FURS		4. CLOTHING		5. OFFICE EQUIPMENT		6. TV, RADIO, STEREO		PROPERTY INVENTORY NO(S).									
<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R									
7. HOUSEHOLD GOODS		8. CONSUM. GOODS		9. FIREARMS		10. NARC./DANGEROUS DRUGS		11. OTHER		12. HOME ADDRESS		13. SEX-RACE-AGE CODE M, 1, 70-1554-55120 Brn White									
<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		<input type="checkbox"/> T \$ <input type="checkbox"/> R		D N A		COMPL. 45 ft Brown									
11. OFFENDER'S NAME (OR DESCRIBE CLOTHING, ETC.) • Blanchard, Michael										12. HOME ADDRESS											
14. C.B. NO.										15. I.R. NO., V.D. NO. OR J.D.A. NO.		16. OFFENDER REL. CODE		17. C.B. NO.		18. I.R. NO., V.D. NO. OR J.D.A. NO.		19. OFFENDER REL. CODE		20. ARREST. UNIT NO.	
OFF. 1										OFF. 1		OFF. 1		OFF. 1		OFF. 1		OFF. 1			
16. DEF.'S VEHICLE		YEAR	MAKE	BODY STYLE	COLOR	V.I.N.		STATE LICENSE NO.		STATE											
20. NARRATIVE Event #2104408756, In summary, B/10 is adding the UCR code of Criminal Trespass to Residence -1365 along with a complete address of the offender.										17. RD NO. JC 182005											
20. EXTRA COPIES REQUIRED (NO. & RECIPIENT)										21. DATE THIS REPORT SUBMITTED - • DAY MO. YR. 5 Apr 2021		TIME 1013		22. SUPERVISOR APPROVING (PRINT NAME) STAR NO. M. INGLESIDE 1820.		23. CONTINUED OTHER SIDE					
23. REPORTING OFFICER (PRINT NAME) STAR NO. • C Copata 18345										24. REPORTING OFFICER (PRINT NAME) STAR NO.		25. DATE APPROVED (DAY-MO-YR.) TIME • 5 APR 2021 1016.		26. SIGNATURE							
SIGNATURE C Copata										SIGNATURE											

\*MUST BE COMPLETED IN ALL CASES

35-2

(Court Branch #  
or District #)

(Court Date/Time)

AREA 2 SUMMONS  
(Arresting Agency #)

## Exhibit 4

(Rev. 3/19/99) CCCR-0655

## MISDEMEANOR COMPLAINT (This form replaces CCG-0655, CCMC-0222 &amp; CCMC-0225)

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

The People of State of Illinois,

Plaintiff

v.

MICHAEL BLANCHARD

Defendant.

NO. \_\_\_\_\_

GRACE STOVALL

(Complainant's Name Printed or Typed)

complainant, now appears before

The Circuit Court of Cook County and states the following:

That: MICHAEL BLANCHARD of 5112 S INGLESIDE 1ST FL, CHICAGO, IL has, on or about  
(defendant) (address)4 APRIL 21 at the location of 5112 S INGLESIDE 3RD FL, CHICAGO, IL COOK  
(date) (place of offense)

committed the offense(s) of CRIMINAL TRESPASS TO RESIDENCE

in that he/she KNOWINGLY CAME TO THE PROPERTY OF GRACE STOVALL LOCATED AT 5112 S INGLESIDE 3RD FL  
CAME INTO HER APARTMENT UNANNOUNCED, AND STATED, "I CAN COME INSIDE ANYTIME, BECAUSE IT'S MY  
BUILDING". ABOVE CAME INTO THE PROPERTY WITHOUT THE PERMISSION OR AUTHORITY OF GRACE STOVALLin violation of 720 Illinois Compiled Statutes  
(Chapter)

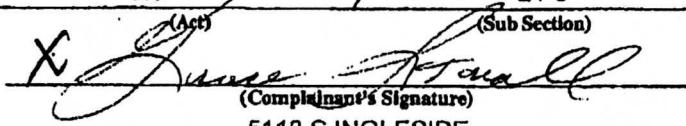
5.0

21-3

(Sub Section)

AOIC Code

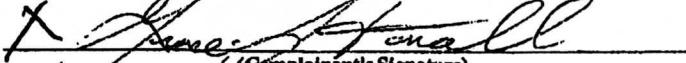
--	--	--	--	--	--

  
 (Complainant's Signature)  
 5112 S INGLESIDE  
 (Complainant's Address)
STATE OF ILLINOIS } ss:  
COOK COUNTY }

(Complainant's Telephone)

GRACE STOVALL

(Complainant's Name Printed or Typed)

The complainant, being first duly sworn on oath, deposes and says that he/she read the foregoing complaint by him/her subscribed and  
that the same is true.
  
 (Complainant's Signature)

Subscribed and sworn to before me on this 5 day of APRIL, 2021

(Judge or Clerk)

I have examined the above complaint and the person presenting the same and have heard evidence thereon, and am satisfied that there is  
probable cause for filing same. Leave is given to file said complaint.SUMMONS ISSUED, Judge \_\_\_\_\_ Judge's No.  
or

WARRANT ISSUED, Bail set at: \_\_\_\_\_

BAIL SET AT: \_\_\_\_\_ Judge \_\_\_\_\_ Judge's No.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

CHICAGO POLICE DEPARTMENT  
**ORIGINAL CASE INCIDENT REPORT**

3510 S. Michigan Avenue, Chicago, Illinois 60653  
 (For use by Chicago Police Department Personnel Only)  
 CPD-11.388(6/03)-C)

RD #: JE186398

EVENT 2109109441

#:

Case ID: 12329702 CASR229

Exhibit 5

IUCR: 0810 - Theft - Over \$500

Occurrence 5112 S Ingleside Ave, #3  
 Location: Chicago IL 60615  
 090 - Apartment

Beat: 0233 Unit Assigned: 9187  
 RO Arrival Date: 01 April 2021 15:09

Occurrence Date: 31 March 2021 13:00 - 31 March 2021 21:00

## Victim Individual

Name: STOVALL, Grace  
 Res: 5112 S Ingleside Ave #3 Chicago IL 60615 Beat: 0233 Beat: 5100  
 773 - 540 - 8661  
 Female Black DOB: 22 August 1962  
 Age: 58 Years

Sobriety: Sober

## Name: BLANCHARD, Michael

Res: 5114 S Ingleside Ave #1FL Chicago IL 60615 Beat: 0233  
 5112 S Ingleside Ave Chicago IL 60615 Beat: 0233  
 Landlord

Male Black Age: 70 years - 75 years  
 5'04-5'05  
 110 lbs  
 White Hair  
 Short Hair Style  
 Light Brown Complexion

## Name: BLANCHARD, Mark

Res: 5112 S Ingleside Ave #2FL Chicago IL 60615 Beat: 0233  
 Landlord

Male Black Age: 30 years - 35 years  
 5'04-5'05  
 110 lbs  
 Unknown Eyes  
 Black Hair  
 Afro Hair Style  
 Dark Complexion

## Name: BLANCHARD, Deesatra

Res: 5114 S Ingleside Ave #1FL Chicago IL 60615 Beat: 0233  
 Landlord

Female Black Age: 60 years - 65 years  
 5'07-5'08  
 145 lbs  
 Unknown Eyes  
 Brown Hair  
 Short Hair Style  
 Light Brown Complexion

Exhibit 6

Name: ROBINSON, Steven

Res: 5114 S Ingleside Ave #2FL  
Chicago IL 60615

Beat: 0233

Demographic

Male  
Black  
5'10,  
300 lbs  
Unknown Eyes  
Black Hair  
Short Hair Style  
Light Complexion

Age: 60 years - 65 years

(Victim)

STOVALL, Grace

is a Tenant of

(Offender)

BLANCHARD, Michael

(Victim)

STOVALL, Grace

is a Neighbor of

(Offender)

BLANCHARD, Mark

(Victim)

STOVALL, Grace

is a Tenant of

(Offender)

BLANCHARD, Deeatra

(Victim)

STOVALL, Grace

is a Neighbor of

(Offender)

ROBINSON, Steven

Victim Information Provided

Flash Message Sent? No

Property

Quantity:	1	Estimated Value:	\$200.00	Used as Weapon?	No
Type:	Purses/Handbags/Wallets			Taken/Stolen?	Yes
Description:	Briefcase With Gold Zippers	Owner:	Stovall, Grace	Recovered?	No
Model #:	Samsonite			Seized?	No
				Unknown Status?	No
				Damaged?	No

Quantity:	10	Used as Weapon?	Yes
Type:	Office-Type Equipment	Taken/Stolen?	Yes
Description:	10 Boxes Of Federal Litigation Papers/Banker Boxes	Recovered?	No
		Seized?	No
		Unknown Status?	No

CHICAGO POLICE DEPARTMENT  
**ORIGINAL CASE INCIDENT REPORT**

3510 S. Michigan Avenue, Chicago, Illinois 60653  
 (For use by Chicago Police Department Personnel Only)  
 CPD-11.388(6/03)-C

RD #: JE189305

Case ID: 12331948 cas1201

EVENT #: 2109408756

Exhibit 7

APPROVAL COMPLETE

IUCR: 0460 - Battery - Simple

Occurrence 5112 S Ingleside Ave  
 Location: Chicago IL  
 090 - Apartment - Apartment Building  
 Occurrence Date: 04 April 2021 14:23

Beat: 0233

Unit Assigned: 0233

RO Arrival Date: 04 April 2021 15:34

## VICTIM: Michael

Name: STOVALL, Grace

Res: 5112 S Ingleside Ave 3  
 Chicago IL  
 773 - 540 - 8661

Beat: 0233

Sobriety: Sober  
 CPD Officer: No

## Demographic

Female DOB: 22 August 1962  
 Black Age: 58 Years  
 5'09, Birth Place: Illinois  
 160 lbs  
 Brown Eyes  
 Black Hair  
 Pony Tail Hair Style  
 Light Brown Complexion

## Identification:

Type	State	Number
State Id	Illinois	31431262839S

Injured BY offender

Extent:

CPD First Aid Given? Yes

CFD First Aid Given? Yes

Responding Unit: 04

Injury Cause: Other

Reason: Other

## Suspect:

Name: BLANCHARD, Michael

## Demographic

Male  
 Black  
 5'06,  
 120 lbs  
 Brown Eyes  
 Light Brown Complexion

## Miscellaneous

Victim Information Provided

Flash Message Sent? No

3/12/23, 2:46 PM

Screenshot\_20230130-153408\_Messages.jpg

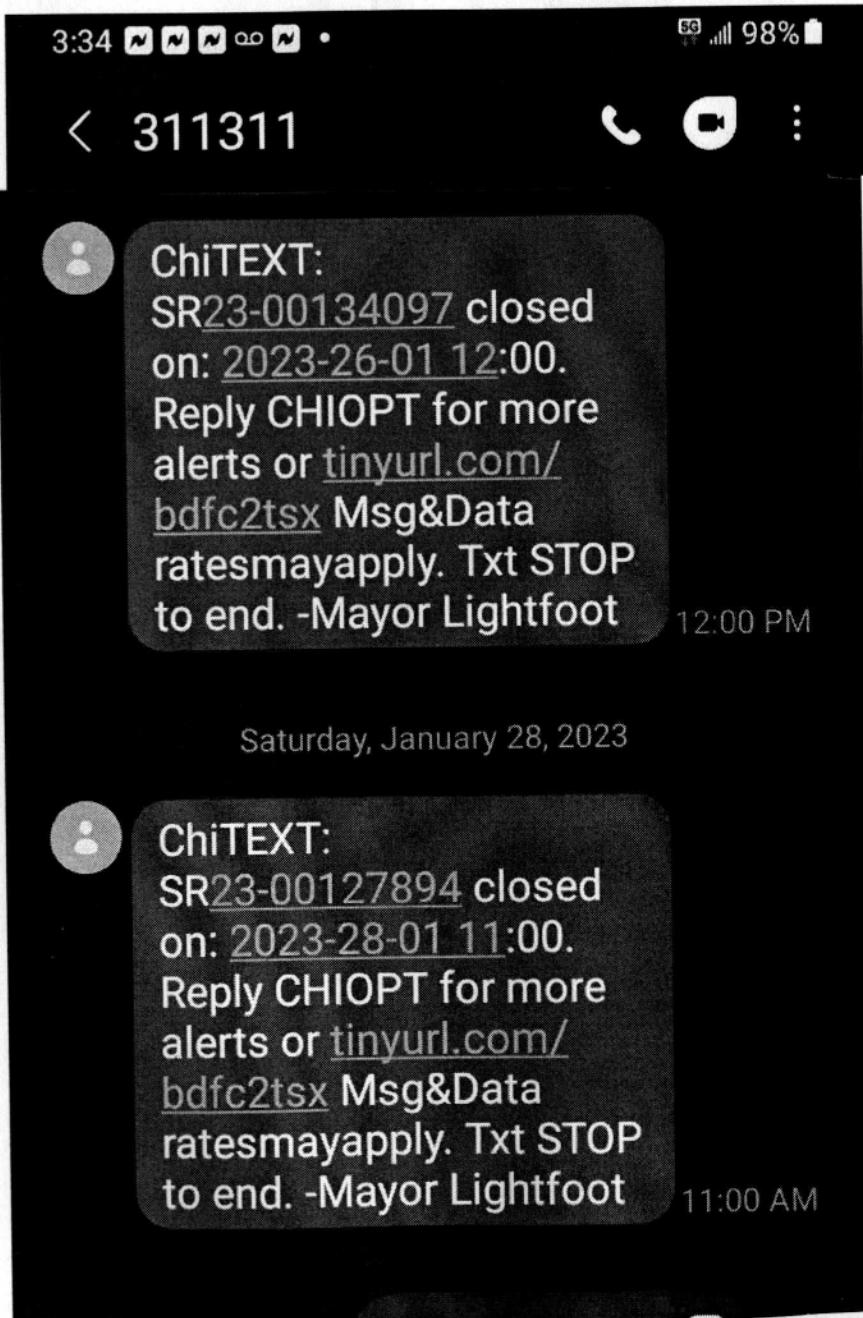


Exhibit 8

Exhibits 8, 9 and 10 shows illicit messages from Defendant Lori Lightfoot who “acted in concert” to illegally close 311 building complaints reported for dangerous and explosive conditions of smoking electrical wires in the walls, due to Blanchard’s illegal “meter jumping” to steal electricity for his building at 5114/5112 S. Ingleside, Chicago Illinois.

< 311311



Wednesday, February 15, 2023



ChiTEXT: SR23-00134075  
closed on: 2023-15-02  
15:30. Reply CHIOPT  
for more alerts  
or [tinyurl.com/bdxfc2tsx](https://tinyurl.com/bdxfc2tsx) Msg&Data  
ratesmayapply. Txt STOP  
to end. -Mayor Lightfoot

Exhibit 9

ChiTEXT: SR23-00128002  
closed on: 2023-15-02  
15:30. Reply CHIOPT  
for more alerts  
or [tinyurl.com/bdxfc2tsx](https://tinyurl.com/bdxfc2tsx) Msg&Data  
ratesmayapply. Txt STOP  
to end. -Mayor Lightfoot

ChiTEXT:  
SR23-00127977 closed  
on: 2023-15-02 15:30.  
Reply CHIOPT for more  
alerts or [tinyurl.com/bdxfc2tsx](https://tinyurl.com/bdxfc2tsx) Msg&Data  
ratesmayapply. Txt STOP  
to end. -Mayor Lightfoot

3:30 PM

Exhibits 8, 9 and 10 shows illicit messages from Defendant Lori Lightfoot who “acted in concert” to illegally close 311 building complaints reported for dangerous and explosive conditions of smoking electrical wires in the walls, due to Blanchard’s illegal “meter jumping” to steal electricity for his building at 5114/5112 S. Ingleside, Chicago Illinois.

7:04 5G 66%

< 311311



3:30 PM

Thursday, March 16, 2023

Exhibit 10



ChiTEXT: SR  
23-00134112  
closed on:  
2023-16-03  
16:07. Reply  
CHIOPPT for  
more alerts or  
tinyurl.com/  
bdfc2tsx  
Msg&Data  
ratesmayapply.  
Txt STOP to  
end. -Mayor  
Lightfoot

4:07 PM

Exhibits 8, 9 and 10 shows illicit messages from Defendant Lori Lightfoot who “acted in concert” to illegally close 311 building complaints reported for dangerous and explosive conditions of smoking electrical wires in the walls, due to Blanchard’s illegal “meter jumping” to steal electricity for their building at 5114/5112 S. Ingleside, Chicago Illinois.